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March 20, 2003

Spent Fuel Project Office, Attn Ms. Snyder  
Mail Stop O13-D13  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Re: Comments on the Package Performance Study Protocol

To Whom It May Concern:

I think that we need to think through the cask design considerations very carefully. The volume of shipments to Yucca Mountain, NV, and Skull Valley, UT is going to be very high over an extended period of time.

I live in Chicago, which next to Las Vegas, looks to have probably the highest volume of high-level radwaste truck and rail shipments of any city anywhere in the country. I work less than 100 feet from a busy interstate that will likely be a truck route. I go to downtown Chicago, which is near both truck and rail routes.

In my opinion, the cask design must include the following considerations:

- 1: We need real-world testing of each cask design. Computer modeling is not sufficient. Moreover, this testing should be to a failure threshold, so we know just how sturdy these casks are in what circumstances. If we have failure thresholds, we can provide this information to first responders in the case of an accident and they can make an informed decision about how far to put their personnel into harms way.
2. Any casks that will be transported by water should undergo real-world submersion tests. Several WI and MI nuclear power plants are on the shores of Lake Michigan. Lake Michigan provides drinking water to Chicago, Milwaukee and many smaller communities. While some parts of the lake are shallow, some are very deep: the average depth is almost 300 feet. The pressure of water at these lower depths can be extraordinarily powerful. Better yet, casks should forgo transportation in any halfway deep body of water.  
I have relatives in Kiev, Ukraine, and I know how their drinking water has been permanently contaminated by the accident at Chernyobl, with real-world cancers and immune system disorders resulting.

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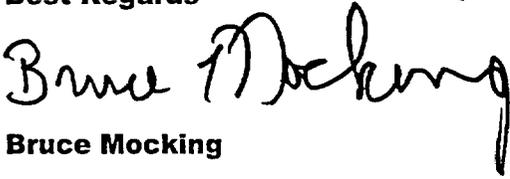
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Call = A. Snyder (ANS3)  
A. J. Murphy (ASM1)

3. **In the post-9/11 world we must unfortunately accept the distinct possibility that these casks will be attractive targets for terrorists. Each cask design should undergo explosive testing to study cask integrity in event of a terrorist attack.**

**The fact of the matter is, that, potential terrorist attacks aside, accidents happen, to ordinary drivers and trains as well as vehicles and trains transporting these casks. And the more miles driven, or traveled by rail, the higher the likelihood of an accident becomes. We must have rigorous testing of each cask design that will ensure that the casks will not be breached by most possible accidents.**

**In addition, I think that deeper consideration needs to be given to the routing of these casks to minimize the exposure of people. There are a variety of potential routes. How many people live within a half mile of any given route? I think routing shipments, by rail or truck, through downtown Chicago, is a bad idea. The population density is extremely high, and the cost of decontamination and clean-up, if a cask rupture were to occur, would be truly astronomical, instead of just merely astronomical.**

**Best Regards**

A handwritten signature in black ink that reads "Bruce Mocking". The signature is written in a cursive, flowing style with a large, prominent "B" and "M".

**Bruce Mocking**